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October 23, 2024

VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *Authors Guild et al. v. OpenAI, Inc., et al., and Alter et al. v. OpenAI Inc., et al.*, Nos. 1:23-cv-08292-SHS & 1:23-cv-10211-SHS

Dear Judge Wang:

Pursuant to Rule IV.a of Your Honor's Individual Practices, we submit this letter-motion to seal on behalf of the Author Plaintiffs in the above-captioned actions in connection with documents referenced in Plaintiffs' contemporaneously filed letter motion for a pre-motion conference regarding text messages. The redactions in Plaintiffs' letter-motion describe documents that Microsoft produced in discovery and designated Attorneys' Eyes Only.

In light of the parties' ongoing conferrals, the issues in the above-referenced letter motion were not crystallized until today. To give Microsoft enough time to provide its position on the motion to seal, Plaintiffs move to seal until Monday October 28.

Plaintiffs understand this to be consistent with Microsoft's view. Microsoft said to Plaintiffs, "We will file a response in support of filing the Microsoft exhibits documents under seal in due course, and plaintiffs can indicate as such in the letter motion to seal."

Respectfully submitted,

LIEFF CABRASER HEIMANN
& BERNSTEINS LLP

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COWAN DEBAETS
ABRAHAMS & SHEPPARD
LLP

/s/ Rachel Geman

/s/ Rohit Nath

/s/ Scott J. Sholder

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cc: All Counsel of Record (via ECF)

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Page 2